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REGULATORY AUTH.

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Guy M. Hicks
General Counsel

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March 24, 1998

OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of the
Telecommunications Act of 1996*
Docket No. 97-00309

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s supplemental responses to AT&T's First Data Requests. A copy has been provided to counsel of record.

Very truly yours,


Guy M. Hicks

GMH:ch

Enclosure

REQUEST: Describe any testing or studies that BellSouth has undertaken or commissioned to determine the average expected duration of service outages for conversion of an existing BellSouth customer to a CLEC who provides service through a combination of UNEs. Describe the results of any such testing or studies.

RESPONSE: No such testing or studies are available.

REQUEST: Has BellSouth investigated any alternatives to collocation for providing UNEs to CLECs who wish to use combinations of UNEs to provide service in Tennessee? If so, please describe these alternatives and explain BellSouth's reasons for not making these alternatives available to CLECs prior to this date. If not, when will any such investigation be done.

RESPONSE: Yes. BellSouth has examined the offerings of various incumbent local exchange companies and has determined that, of these, collocation is the appropriate arrangement for CLECs to combine unbundled network elements. AT&T proposed several alternatives to collocation in its January 6, 1998 letter to Duane Ackerman. BellSouth responded by letters dated February 10, 1998 and March 17, 1998, copies of which were produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

REQUEST: Will BellSouth permit CLECs to purchase UNEs as they are already combined in BellSouth's network, at individual UNE rates plus an additional "glue charge?" If so, define the "glue charge" and describe how that charge will be calculated. If not, state the basis on which BellSouth refuses to provide UNEs as they are already combined in BellSouth's network.

RESPONSE: Section II.F.3 of BellSouth's SGAT contains the combinations of network elements that BellSouth currently provides. The price for each of these combinations is the sum of the applicable individual element prices as set out in Attachment A of the SGAT, which will be conformed to the prices established by the TRA in Docket 97-01262. BellSouth also is prepared to discuss with AT&T the opportunity of a professional service arrangement in which BellSouth would combine UNEs for AT&T at market rates. This offer was communicated in BellSouth's March 17, 1998 letter to AT&T, a copy of which was produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through "direct separation and recombination," i.e., by directly disconnecting and reconnecting (through ILEC and CLEC technicians or a third party vendor) the cross-connect at the MDF at UNE rates? If not, state: (a) the basis for refusing to allow such recombination; (b) the manner in which BellSouth will provide the separated loop and switch combination; and (c) what rewiring, if any, BellSouth will permit at the MDF, the Intermediate Distribution Frame ("IDF") and/or in the CLEC's collocated space.

RESPONSE: No. See the letters from BellSouth to AT&T dated February 10, 1998 and March 17, 1998, copies of which were produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through the use of permanently-installed pre-wired CLEC connector blocks on the MDF at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks: and (b) the manner in which BellSouth will provide cross-connection to the MDF.

RESPONSE: No. See the letters from BellSouth to AT&T dated February 10, 1998 and March 17, 1998, copies of which were produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through the use of an electronic cross-connect system at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks; and (b) the manner in which BellSouth will provide cross-connection to the MDF.

RESPONSE: No. See the letters from BellSouth to AT&T dated February 10, 1998 and March 17, 1998, copies of which were produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

REQUEST: Will BellSouth permit CLECs to recombine the loop and switch through use of the "recent change" process at UNE rates? If not, state the basis for refusing to allow recombination using the "recent change process."

RESPONSE: No. See the letters from BellSouth to AT&T dated February 10, 1998 and March 17, 1998, copies of which were produced in BellSouth's Supplemental Response to AT&T's First Production of Documents Item No. 28.

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 1998, a copy of the foregoing document was served on the parties of record, via US Mail, addressed as follows:

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